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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northeast Fisheries Science Center
166 Water Street
Woods Hole, MA 02543-1026

April 11, 2002

USCG-2001-10486-2

U. S. Coast Guard
Docket Mgt. Facility (USCG-2001010486)
U. S. Dept. of Transportation
Room PL-401
400 Seventh St., SW
Washington, D.C. 20590-0001

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NOAA/NEFSC/PL-401

Gentlemen:

The Northeast Fisheries Science Center acknowledges that the threat of invasive species is a serious one and that ballast water from ships presents a significant vehicle for introduction. In response to the request for comments on Standard for Living Organisms in Ship's Ballast Water Discharged in U.S. Waters, 33 CFR Part 151 (Federal Register, Vol. 67, No. 42, 4 March 2002), we have the following comments.

Attempting to find an optimum single strategy when there are multiple scales of species combined with several levels of vessel and handling capabilities is an intractable problem. A matrix approach may be considered. Further, a strategy to combat the introduction of non-indigenous species should be based upon common sense with respect to specific situations. For example, open ocean exchange should be recommended when possible, and inshore treatment should be recommended when open ocean exchange is impossible or impractical. We note that theoretically a single algal cell or a single gravid macro-invertebrate can inoculate a system. Total sterilization is prohibitively expensive; therefore, risk cannot be eliminated totally. With this in mind, arguments about concentration vs total load assume limited meaning.

On a more positive note, most current shipping routes are likely approaching a peak regarding possible introductions of xenobiotics. Those species able to invade have probably already done so. Thus, one possible cost reduction strategy could be to



allow relatively inexpensive techniques for vessels on historically established routes. Savings here could theoretically be used to enforce more thorough treatment on newly established routes, and when a new vector is identified.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. P. Sissenwine', with a long horizontal flourish extending to the right.

Michael P. Sissenwine
Science and Research Director

c: T. Noji